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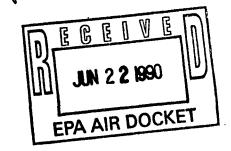


PENNZOIL PLACE • P.O. BOX 2967 • HOUSTON, TEXAS 77252-2967 • (713) 546-6665

June 14, 1990

W. M. ROBB Executive Vice President Manufacturing

Central Docket Section A-90-16 Air Docket (LE131) U. S. Environmental Protection Agency Room M-1500 Washington, D.C. 20460



Dear Sirs:

Pennzoil recommends approval of Ethyl Corporation's fuel additive waiver petition to allow use of MMT, the manganese-based anti-knock and octane booster.

In general, we support the development and use of octane improver additives for gasoline blending provided they are cost effective, proven safe to use, and are consistent with the national objective of improving air quality through reduced emissions. Since Ethyl's MMT additive has apparently met these criteria, it is in the best interest of Pennzoil, the industry, and the national economy to support its use.

Sincerely,

W. M. Robb

WRM/sm D:\WMR.061490A

cc:
Mary T. Smith
Director
Field Operations & Support Division (EN-397F)
EPA
Washington, D.C. 20460